

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10852 (KBO)
(Jointly Administered)

Related to Docket Nos. 621 and 622

**CERTIFICATE OF NO OBJECTION REGARDING
FIRST COMBINED MONTHLY FEE APPLICATION OF
GELLERT SCALI BUSENKELL & BROWN, LLC, AS SPECIAL CONFLICTS
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR
REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED
FOR THE PERIOD OF AUGUST 4, 2023 THROUGH SEPTEMBER 30, 2023**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading has been received to the *First Combined Monthly Fee Application of Gellert Scali Busenkell & Brown, LLC, as Special Conflicts Counsel for the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period of August 4, 2023 through September 30, 2023* (the “Application”) [Docket No. 621] filed on October 17, 2023. The undersigned further certifies that the Court’s docket in this case has been reviewed and no answer, objection or other responsive pleading to the Application appears thereon. Pursuant to the Notice of Application [Docket No. 622] filed on October 17, 2023, objections to the Application were to be filed and served no later than November 7, 2023 at 4:00 p.m. prevailing Eastern Time.

Pursuant to the Order (I) Establishing Procedures for Interim Compensation and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [Docket No. 436], the Debtors are authorized to pay \$15,062.40 which represents 80% of the fees (\$18,828.00) and \$357.00 which represents 100% of the expenses requested in the Application, upon the filing of this Certification without the need for entry of a Court order approving the Application.

Dated: November 14, 2023
Wilmington, Delaware

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Ronald S. Gellert

Ronald S. Gellert (DE 4259)
1201 N. Orange St., Suite 300
Wilmington, Delaware 19801
Telephone: (302) 425-5806
Facsimile: (302) 425-5814
rgellert@gsbblaw.com

*Special Conflicts Counsel to the
Official Committee of Unsecured Creditors*